



RHODE ISLAND

DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

235 Promenade Street, Providence, RI 02908-5767

TDD 401-222-4462

October 13, 2017

Interim Remedial Measures Work Plan

File No. SR-07-0255

Formerly Case No. 2000-044

DEM Freshwater Wetlands Program Application No. 17-0245

Joseph Guarnaccia, EHS Remediation Specialist

BASF Corporation

100 Park Avenue

Florham Park, New Jersey 07932

RE: Interim Remedial Measures Work Plan

Ciba-Geigy facility

180 Mill Street

Cranston, Rhode Island

Plat Map 4 / Lot 1102

Dear Mr. Guarnaccia:

The Rhode Island Department of Environmental Management's (the Department) Office of Water Resources-Freshwater Wetlands Program has reviewed the **Interim Remedial Measures (IRM) Workplan** for the above referenced property (the Site), which was submitted on October 3, 2017, by AEI Consultants requesting an exempt activity status for proposed work under Rule 6.08 of the Rules & Regulations Governing the Administration and Enforcement of the Freshwater Wetlands Act and the Department's **Rules and Regulations for the Investigation and Remediation of Hazardous Material Releases (the Remediation Regulations)**.

After careful review of the **Interim Remedial Measures (IRM) Workplan**, the Department approves the proposed IRM work as an exempt activity provided the following conditions are adhered to:

1. All general conditions for exempt activities outlined in Rule 6.01 are to be adhered to.
2. Site plans still reference a two (2) foot soil cap to be placed over the entire site. **The IRM activities are limited only to those activities that result in final grading at or below existing grades within designated floodplain. No permanent changes in grade may occur within floodplain, floodway, or within the 200-foot riverbank wetland of the Pawtuxet River.**
3. Temporary erosion control and soil stabilization measures that have been specified are considered adequate for the time being, provided that such controls are monitored and repaired as necessary. However, the IRM should specify that **"all vegetated areas within the 200-foot riverbank wetland that are disturbed as a result of remediation work are to be re-vegetated in a**




manner similar to existing conditions unless a permit is obtained to implement an alternative means of stabilizing or utilizing the site".

4. It is understood that other measures being utilized as part of the IRM, including but not limited to fractionation tanks, access roads, equipment associated with the ozone ISCO treatment, piping and any related utilities are temporary measures that are to be removed upon completion of remediation work to allow restoration and revegetation of the riverbank wetland, unless a permit is obtained to implement any other permanent improvements.

The Department will issue a Remedial Approval Letter (RAL) for the Corrective Measures Implementation workplan received at the OWM on September 11, 2017 once AEI/BASF and the DEM Freshwater Wetlands Program have concurred on the capping proposal for Lot 1102 soil contamination within the floodplain, floodway, or within the 200-foot riverbank wetland of the Pawtuxet River.

If you have any questions regarding this letter or would like the opportunity to meet with Department personnel, please contact me by telephone at (401) 222-2797, ext. 7102, or by E-mail at jeff.crawford@dem.ri.gov.

Sincerely,



Jeffrey Crawford, Project Manager
Principal Environmental Scientist
Office of Waste Management

cc: Kelly Owens, Supervising Engineer OWM
Charles Horbert, Supervisor, DEM Freshwater Wetlands
Kim Tisa, USEPA TSCA
Frank Battaglia, USEPA RCRA Corrective Action
Richard Kowlaski, AEI Consultants